

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

THOMAS WILLIAMS) CASE NO. 1:23-cv-0095
)
Plaintiff,)
) JUDGE: DONALD C. NUGENT
vs.)
)
HARRY WILLIAMSON ET AL.,) BRIEF IN OPPOSITION TO
) DEFENDANT WILLIAMSON'S
Defendants.) REQUEST FOR EXTENSION OF TIME
)

Plaintiff, Thomas Williams vehemently and righteously opposes and objects to Remover and Defendant Henry Williamson's 60-day request for extension. The motion represents another stall tactic by an individual who has a bald-faced history of abusing the legal process. His removal to this Court was done for one purpose and one purpose only; to avoid sanctions and abuse discovery. Further, Remover and Defendant knew as far back as November 25, 2022, that he would need a new lawyer. The following demonstrates his actual knowledge of his need to retain a new attorney and his disregard of the obvious:

- On November 25, 2022, Plaintiff filed a Motion to Disqualify Defendant Brian Bardwell from representing Harry Williamson; (See Exhibit 4, Cuyahoga County Docket, Motion to Remand)
- On December 6, 2022, Plaintiff filed a supplemental brief in support of the motion to disqualify; (See Exhibit 4)

- On December 13, 2022, Judge Burnside's order reflected the following:

IN MEANTIME ATTY BARDWELL TO CONSULT EXPERT ETHICS PERSON ON PROPRIETY OF REPRESENTING DEFT WILLIAMSON GIVEN BARDWELL IS ALSO A DEFT IN THE ACTION AND WHETHER CONFLICT IS WAIABLE ONE OR NOT. LORAIN COUNTY BOARD OF COMMISSIONERS, DAVID MOORE, MATT LUNDY, JAMES CORDES AND TOM WILLIAMS' MOTION TO QUASH SUBPOENAS, FILED 12/09/2022 BY BRIAN C LEE 0081675, IS GRANTED IN PART. P1 THOMAS WILLIAMS' MOTION FOR EMERGENCE STATUS CONFERENCE TO DISQUALIFY DEFENDANT BRIAN BARDWELL, FILED 11/25/2022 BY WILLIAM J NOVAK 0014029, IS UNKNOWN. THIS ISSUE WAS DISCUSSED AT THE HEARING AND WILL BE DETERMINED BY THE COURT AT A LATER TIME, IF NECESSARY.

TAKEN BY JUDGE JANET R BURNSIDE. NOTICE ISSUED; (See Exhibit 4)

- On December 28, 2022, the issue of Defendant Bardwell's ability to represent Williamson was once again mentioned by Judge Burnside; (See Exhibit 4)
- On January 30, 2023, Defendant Bardwell was disqualified from representing Williamson, for ethical reasons; (See Exhibit 4)
- On February 13, 2023, attorney, Subodh Chandra entered a notice of limited appearance for purposes of filing a notice of appeal. On the issue of Defendant Bardwell's disqualification from representing Remover, and Defendant Harry Williamson; (See Exhibit 4)
- On February 16, 2023, Judge Burnside issued an order, scheduling a hearing on motions for sanctions on March 27, 2023, at which time Plaintiff and Non-Parties are to present evidence of damages relating to the sanction motions. (See Exhibit 4)

Remover and Defendant Williamson achieved civil process abuser status in the state courts. Now, he intends to achieve that same status in the federal courts. Enough is enough. This last Hail Mary pass will not result in a touchdown because time has run out on the clock.

Respectfully submitted,

/s/ William J. Novak
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CERTIFICATE OF SERVICE

A true copy of the foregoing was served on this 2nd day of March, 2023 by electronic mail and the court's electronic filing system on the following:

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